

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 1:18-CR-3495-001 JCH
)	
vs.)	
)	
DOUGLAS D. SMITH,)	
)	
Defendant.)	

DEFENDANT’S AMENDED EXHIBIT LIST

Mr. Douglas Smith, by and through undersigned counsel, Assistant Federal Public Defender Aric G. Elsenheimer, respectfully submits the following list of anticipated Exhibits which may be submitted at trial and requests permission to amend such list to include additional exhibits as may become necessary prior to and during trial:

Exhibits A1-A3: General photographs/maps to show location and positioning.

- A1—Google Earth Map image of Western Winds Motel;
- A2—Google Earth map image of Western Winds Motel (larger scale);
- A3 - Clerk’s Office Land Survey;

Exhibit B1-B9: Photographs of Mr. Smith's property taken in

Spring/Summer 2018;

B1—Front of Western Winds Motel, BN 657;

B2—E.T.'s apartment;

B3—From E.T.'s Apartment;

B4—Yard and driveway;

B5—Yard and trailer;

B6—Trailer and car;

B7—Wood pile;

B8 — Foliage;

B9 — Foliage;

B10 – Foliage

B11 – Night photo of porch;

B12 – From porch;

B13 – Porch

B14 – Porch

B15 – View of yard from porch.

C1-C9 – Officer Rael's lapel video images and Detective Abeyta

Photos;

C1 – Gun and Darkness

C2 – Trailer in darkness;

C3 – Abeyta photo of trailer;

C4 – Abeyta photo of trailer door;

C5 – House sweep;

C6 - Darkness around trailer;

C7 – Darkness;

C8 – Darkness;

C9 – Foliage in the darkness;

Exhibit D1-D5—Photographs of markings on tree at southwest corner of Mr. Smith’s courtyard.

Exhibit E – OMI Toxicology Report.

Any exhibit listed in the Government’s exhibit list filed on September 14, 2020 (Doc. 120).

Respectfully Submitted,

FEDERAL PUBLIC DEFENDER

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/s/ Amanda R. Lavin

/s/ Aric G. Elsenheimer

Assistant Federal Public Defenders